



GEORGETOWN LAW
INSTITUTE FOR PUBLIC REPRESENTATION

Hope M. Babcock
Angela J. Campbell
Brian S. Wolfman
Directors
Adrienne Biddings+*
Leah Nicholls
Jamie Pleune
Guilherme Roschke
Margie Sollinger
Staff Attorneys

600 New Jersey Avenue, NW, Suite 312
Washington, DC 20001-2075
Telephone: 202-662-9535
TDD: 202-662-9538
Fax: 202-662-9634

June 30, 2010

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Standardized and Enhanced Disclosure Requirements for Television
Broadcast Licensee Public Interest Obligations, MB Docket 00-168*

Dear Ms. Dortch:

On June 29, 2010, Meredith McGehee from Campaign Legal Center, Cheryl Leanza and Sara Fitzgerald of the Office of Communication of the United Church of Christ, Inc., Charles Benton and Cecilia Garcia of Benton Foundation, Corie Wright of Free Press, Tom Glaisyer of New America Foundation, Katherine Greenwich of the United States Conference of Catholic Bishops and Angela Campbell and Adrienne Biddings of the Institute for Public Representation on behalf of the Public Interest Public Airwaves Coalition ("PIPA") met with William Freedman, Mary Beth Murphy, Holly Sauer, Simon Banyani, Robert Baker and Hope Cooper of the Media Bureau and Sherille Ismail of the Office of Strategic Planning and Policy Analysis to discuss the above-referenced proceeding.

PIPA encouraged the FCC to act on petitions for reconsideration of the Enhanced Disclosure order so that enhanced reporting requirements already adopted could take effect. Two years has passed since the rules were adopted, and yet, the rules have not been implemented. The Commission should act on the reconsideration expeditiously and not wait until the *Future of Media* report is released.

PIPA urged that on reconsideration, the FCC should adopt modifications that make the

reporting less burdensome for licensees while still ensuring that the public and the FCC have sufficient information. PIPA urged the FCC to better explain the rationale for the reporting requirements and pointed out that the enhanced disclosure data would be extremely helpful to the FCC multiple proceedings. PIPA also stressed the importance of retaining the requirement that television stations make their public files accessible to the public on the station's website and of establishing a data base at the FCC that would be searchable and easy to use.

Respectfully Submitted,

/s/

Adrienne Biddings, Esq.
Staff Attorney
Institute for Public Representation
Georgetown University Law Center
600 New Jersey Avenue, NW
Washington, DC 20001
(202) 662-9535
Counsel for:
United Church of Christ

